UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Norfolk Division

RECOVERY LIMITED PARTNERSHIP, Plaintiff,

v. Civil Action No.: 2:87-cv-00363

UNIDENTIFIED, WRECKED AND ABANDONED SAILING VESSEL, etc.,
Defendant.

STATUS REPORT TO COURT

Recovery Limited Partnership (the "Plaintiff" or "RLP"), by counsel, respectfully submits this Report to the Court as salvor-in-possession of the wreck of the SS CENTRAL AMERICA ("SSCA"). Plaintiff has previously submitted twenty reports, two in Civil Action No. 2:14-cv-160, and eighteen in Civil Action No. 2:87-cv-363. *See* D.E. # 21 and 90 (No. 2:14-cv-160); D.E. # 104, 130, 163, 175, 176, 177, 195, 202, 209, 233, 256, 264, 267, 273, 278, 280, 281, and 289 (No. 2:87-cv-363).

In the most recent report, the Trustee reported that:

Deep sea treasure salvage operations require assembling a team of 30+ people with highly specialized talents and would require significant travel by them from around the world. They must work in close quarters for weeks at a time without access to medical care. Many states, including Virginia, are under stay-at-home orders. Schools are closed, coronavirus cases are still increasing, hospitals are full, non-essential businesses are shut down, and social distancing is the order of the day.

At this time, it is unclear when the novel coronavirus will be contained. Therefore, entering into contractual obligations and asking individuals and business partners to make commitments in these circumstances is not realistic. The Trustee intends to continue what can be done in planning for a salvage expedition as soon as possible, but that operation will likely be during the 2021 salvage season.

See Status Report to Court, dated April 10, 2020, at D.E. # 289.

As unfortunate as it is, much of the above remains the same today, six months later. While stay at home orders are not as prevalent and most businesses are open, social distancing is more than ever the order of the day and nothing we have learned about COVID-19 suggests that a salvage operation would be safe or viable in this environment. The Trustee has not given up hope that a 2021 expedition will be possible, but it may well depend on the wide availability of an effective vaccine. The Trustee is continuing to monitor the situation and intends to mount a salvage expedition as soon as reasonably possible given both the progress of the virus and available seasonal weather windows.

The Trustee is aware that exclusive jurisdiction over the salvage of the wreck of the S.S. Central America lies with this Court. He understands his obligation to notify this Court regarding any future salvage and will seek advance approval before any such salvage is performed in accordance with the Order entered January 11, 2019. D.E. # 276.

The Trustee and counsel are available to address any questions that the Court may have regarding this report.

This 16th day of October, 2020.

/s/ James L. Chapman, IV

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Counsel for Recovery Limited Partnership

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of October, 2020, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ELF system, which will then send a notification of such filing to all registered filers.

/s/ James L. Chapman, IV

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